

JOSEPH SAVERI LAW FIRM, INC.

Joseph R. Saveri (admitted *pro hac vice*)
Joshua P. Davis (admitted *pro hac vice*)
Matthew S. Weiler (admitted *pro hac vice*)
Kevin E. Rayhill (admitted *pro hac vice*)
555 Montgomery Street, Suite 1210
San Francisco, California 94111
Phone: (415) 500-6800/Fax: (415) 395-9940
jsaveri@saverilawfirm.com
jdavis@saverilawfirm.com
mweiler@saverilawfirm.com
krayhill@saverilawfirm.com

*Co-Lead Counsel for the Classes and
Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,
Brandon Vera, and Kyle Kingsbury*

[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,**

Plaintiffs,

vs.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(b),
2 and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on February
3 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis
4 Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated
5 (collectively, "Plaintiffs") hereby move this Court for leave to lodge certain documents under seal
6 related to their motion to challenge Defendant's assertion of work product protection over three
7 certain documents.

8 First, Plaintiffs seek leave to lodge under seal Plaintiffs' Reply In Support Of Motion To
9 Challenge Work Product Designation.

10 Second, Plaintiffs seek leave to lodge under seal Exhibit 4 to the Declaration of Kevin E.
11 Rayhill In Support Of Reply, which is an unredacted version of a document with the Bates number
12 ZFL-0895314, a document containing financial information that Defendant has designated
13 Confidential.

14 Plaintiffs have filed these documents, in accordance with the Court's ECF system, with the
15 instant motion. Plaintiffs have filed placeholders for these documents with the Court, and will serve
16 un-redacted versions of these documents on Defendant.

1 DATED this 26th day of September, 2016

2 **JOSEPH SAVERI LAW FIRM, INC.**

3 By: /s/ Joseph R. Saveri

4 Joseph R. Saveri (admitted *pro hac vice*)
5 Joshua P. Davis (admitted *pro hac vice*)
6 Matthew S. Weiler (admitted *pro hac vice*)
7 Kevin E. Rayhill (admitted *pro hac vice*)
8 555 Montgomery Street, Suite 1210
9 San Francisco, California 94111
10 Phone: (415) 500-6800/Fax: (415) 395-9940
11 jsaveri@saverilawfirm.com
12 jdavis@saverilawfirm.com
13 mweiler@saverilawfirm.com
14 krayhill@saverilawfirm.com

15 *Co-Lead Counsel for the Classes and Attorneys for*
16 *Individual and Representative Plaintiffs Cung Le,*
17 *Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*
18 *Brandon Vera, and Kyle Kingsbury*

19 **COHEN MILSTEIN SELLERS & TOLL,**
20 **PLLC**

21 Benjamin D. Brown (admitted *pro hac vice*)
22 Richard A. Koffman (admitted *pro hac vice*)
23 Hiba Hafiz (admitted *pro hac vice*)
24 1100 New York Ave., N.W., Suite 500, East
25 Tower Washington, DC 20005
26 Phone: (202) 408-4600/Fax: (202) 408 4699
27 bbrown@cohenmilstein.com
28 rkoffman@cohenmilstein.com
hhafiz@cohenmilstein.com

Co-Lead Counsel for the Classes and Attorneys for
Individual and Representative Plaintiffs Cung Le,
Nathan Quarry, Jon Fitch, Luis Javier Vazquez,
Brandon Vera, and Kyle Kingsbury

BERGER & MONTAGUE, P.C.

Eric L. Cramer (admitted *pro hac vice*)
Michael Dell'Angelo (admitted *pro hac vice*)
1622 Locust Street
Philadelphia, PA 19103
Phone: (215) 875-3000/Fax: (215) 875-4604
ecramer@bm.net
mdellangelo@bm.net

*Co-Lead Counsel for the Classes and Attorneys for
Individual and Representative Plaintiffs Cung Le,
Nathan Quarry, Jon Fitch, Luis Javier Vazquez,
Brandon Vera, and Kyle Kingsbury*

**WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP**

Don Springmeyer
Nevada Bar No. 1021
Bradley S. Schrager
Nevada Bar No. 10217
Justin C. Jones
Nevada Bar No. 8519
3556 E. Russell Road, Second Floor
Las Vegas, Nevada 89120
(702) 341-5200/Fax: (702) 341-5300
dspringmeyer@wrslawyers.com
bschrager@wrslawyers.com
jjones@wrslawyers.com

*Liaison Counsel for the Classes and Attorneys for
Individual and Representative Plaintiffs Cung Le,
Nathan Quarry, Jon Fitch, Luis Javier Vazquez,
Brandon Vera, and Kyle Kingsbury*

**WARNER ANGLE HALLAM JACKSON &
FORMANEK PLC**

Robert C. Maysey (admitted *pro hac vice*)

Jerome K. Elwell (admitted *pro hac vice*)

2555 E. Camelback Road, Suite 800

Phoenix, AZ 85016

Phone: (602) 264-7101/Fax: (602) 234-0419

rmaysey@warnerangle.com

jelwell@warnerangle.com

*Counsel for the Classes and Attorneys for
Individual and Representative Plaintiffs Cung Le,
Nathan Quarry, Jon Fitch, Luis Javier Vazquez,
Brandon Vera, and Kyle Kingsbury*

**LAW OFFICE OF FREDERICK S.
SCHWARTZ**

Frederick S. Schwartz (admitted *pro hac vice*)

15303 Ventura Boulevard, #1040

Sherman Oaks, CA 91403

Phone: (818) 986-2407/Fax: (818) 995-4124

fred@fredschwartzlaw.com

Attorneys for Plaintiffs

**SPECTOR ROSEMAN KODROFF &
WILLIS, P.C.**

Jeffrey J. Corrigan (admitted *pro hac vice*)

William G. Caldes (admitted *pro hac vice*)

1818 Market Street – Suite 2500

Philadelphia, PA 19103

Phone: (215) 496-0300/Fax: (215) 496-6611

jcorrigan@srkw-law.com

wcaldes@srkw-law.com

Attorneys for Plaintiffs

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 26th day of September, 2016 a true and correct copy of
3 **PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL** was served via the
4 United States District Court CM/ECF system on all parties or persons requiring notice.

5 By: /s/ Kevin E. Rayhill